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6 HONORABLE RICARDO S. MARTINEZ  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

BOARDS OF TRUSTEES OF THE  
NORTHWEST IRONWORKERS HEALTH  
AND SECURITY FUND, NORTHWEST  
IRONWORKERS RETIREMENT TRUST,  
NORTHWEST FIELD IRONWORKERS  
ANNUITY TRUST FUND, and NORTHWEST  
IRONWORKERS & EMPLOYERS  
APPRENTICESHIP & TRAINING TRUST  
FUND,

No. 2:24-cv-01139-RSM

**STIPULATED MOTION TO EXTEND  
TIME TO ANSWER COMPLAINT**

**NOTE ON MOTION CALENDAR:  
Friday, September 6, 2024.**

14 Plaintiffs,  
15 v.  
16

PETERSON REBAR PLACEMENT LLC,  
Contractors License No. PETERRP857CO, UBI  
NO 603435547; CORNERSTONE GENERAL  
CONTRACTORS, INC.; HARTFORD  
ACCIDENT AND INDEMNITY COMPANY,  
Payment and Performance Bond No.  
34BCSIL8927; and BELLEVUE SCHOOL  
DISTRICT NO. 405,

Defendants.

23 **I. MOTION**

24 Plaintiffs the Boards of Trustees of the Northwest Iron workers Health and Security Fund,  
25 Northwest Ironworkers Retirement Trust, Northwest Field Ironworkers Annuity Trust Fund, and

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1 Northwest Ironworkers & Employers Apprenticeship & Training Trust Fund (collectively “Trust  
2 Funds” or “Plaintiffs”) filed their Complaint in this action on July 29, 2024. Defendants  
3 Cornerstone General Contractors, Inc. (“Cornerstone”) and Hartford Accident and Indemnity  
4 Company, Payment and Performance Bond No. 34BCSIL8927 (collectively “Defendants”)  
5 received service on August 16, 2024, and their Answer is due September 6, 2024. Plaintiffs and  
6 Defendants have agreed to stipulate to additional time for Defendants to respond to Plaintiffs’  
7 Complaint. The Parties to this stipulation hereby agree as follows:

## **II. STIPULATION**

9 Plaintiffs and Defendants hereby stipulate that Defendants' deadline to respond to  
10 Plaintiffs' Complaint is extended by twenty (20) days. Accordingly, the deadline for Defendants  
11 to file an answer or responsive pleading shall be stayed for twenty (20) days from the date of entry  
12 of the Order on this Stipulation. The Parties jointly and respectfully request that the Court enter an  
13 order granting this stipulation for an extension.

DATED this 6th day of September, 2024

**BARLOW COUGHRAN  
MORALES & JOSEPHSON, P.S.**

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and Indemnity Company, Payment and  
Performance Bond No. 34BCSIL8927*

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## ORDER

THIS MATTER came to the attention of the undersigned Judge of the above-titled Court on the Stipulated Motion to Extend Time to Answer Complaint. The Court, having reviewed the records and files herein, and having fully considered the same and found good cause exists therefore:

It is hereby ORDERED, ADJUDGED, and DECREED that Defendants Cornerstone General Contractors, Inc. and Hartford Accident and Indemnity Company, Payment and Performance Bond No. 34BCSIL8927's deadline to respond to the Complaint shall be extended and stayed for a period of twenty (20) days.

DATED this 9<sup>th</sup> day of September, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

Presented by:

**BARLOW COUGHRAN  
MORALES & JOSEPHSON, P.S.**

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this date I caused to be served the foregoing on the following counsel of record by the method indicated:

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- Via Messenger
  - Via Facsimile
  - Via U.S. Mail
  - Via Electronic Mail
  - Via ECF Notification

*Attorneys for Plaintiffs*

Dated this 6th day of September, 2024.

/s/ Rachel Leigh  
Rachel Leigh, Legal Assistant

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